



PTPA Reflects on Performance Track Success and Reaffirms Strong Support for the Program

At EPA's launch of the Performance Track program at its Charter Event in December 2000, then EPA Administrator Carol Browner noted *"These businesses recognize that environmental protection can go hand in hand with economic growth. We are especially appreciative of those companies willing to do more than is required by law to protect public health and insure greater protection of our air, water and land."* In May 2007, current EPA Administrator Stephen Johnson echoed these founding ideas, *"EPA Performance Track partners are ready, willing and able to go well beyond mandated requirements – proving that doing what's good for the environment is also good for the bottom line."*

The Performance Track Participants Association (PTPA), an association comprised of over 260 facilities in the Performance Track program, has been proud to partner with EPA over the past seven years on this initiative where companies volunteer to do more to protect the planet's resources than they are required to by current regulation. PTPA looks forward to continuing to work with the Agency in addressing the environmental challenges we face, and assisting in moving toward a collaborative approach to solving today's environmental challenges.

For a facility or company to earn the distinction of being a Performance Track member, it must first pass a thorough compliance screen (EPA, State and DOJ) and then commit to four 3-year environmental improvement goals that are not regulated. Members then report on their progress annually and these reports are publicly available at www.epa.gov/performancetrack.

There are some who are concerned that not all Performance Track members meet their environmental improvement goals or that some facilities in the program should be in it at all due to compliance related matters.

While it is true that environmental improvement goals are not always met, the picture is incomplete if business decisions, program trends and progress are not considered. Many facilities choose a strategy where they select "stretch" goals that exceed their expectation for success because they know from experience that "setting the bar high" has a way of stimulating innovation and achieving the next level of performance. EPA should be encouraging this kind of innovation through the Performance Track program. Even when a goal is not met, the improvements realized are still very meaningful and beyond what is required by regulations.

As for facilities with potential compliance problems to remain in the program, PTPA shares the concern. We agree that a program like this must be accurate to be credible. We acknowledge and affirm EPA's clear criteria for judging when noncompliance causes a need for withdrawal from Performance Track. PTPA appreciates the competent and professional staff that has engaged in the process of assessing compliance and characterizing and resolving noncompliance situations to ensure the integrity of the program.

PTPA and its member companies strongly support the concepts of the Performance Track program, and firmly believe that it is one of the most promising voluntary programs within EPA. It is unique in its ability to both recognize beyond compliance behavior and the subsequent positive environmental improvements, and more importantly, to encourage others to follow suit. PTPA encourages all who are interested to work with us to help make this program, and others like it, the most successful they can be.